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Attorneys for Defendant Technicolor SA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Tech Data Corp., et al. v. Hitachi, Ltd., et al.,
No. 13-cv-00157*

**DECLARATION OF JEFFREY S.
ROBERTS IN SUPPORT OF THOMSON
SA'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PORTIONS OF ITS
REPLY IN SUPPORT OF ITS MOTION
TO STRIKE WITH PREJUDICE TECH
DATA'S FIRST AMENDED COMPLAINT**

1 I, Jeffrey S. Roberts, declare and states as follows:

2 1. I make this declaration in support of Thomson SA's (n/k/a Technicolor SA)
3 Administrative Motion to File Under Seal Portions of Its Reply in Support of Its Motion to Strike
4 With Prejudice Tech Data's First Amended Complaint ("Motion to Seal"). The statements
5 contained in this declaration are based on my personal knowledge and, if called as a witness, I
6 could competently testify to the following facts.

7 2. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel
8 for Defendants, Technicolor SA (f/k/a Thomson SA) and Technicolor USA, Inc. (f/k/a Thomson
9 Consumer Electronics, Inc.). I am admitted to practice *pro hac vice* before the United States
10 District Court for the Northern District of California.

11 3. Thomson SA's concurrently filed Reply discusses and/or references Exhibits K, L,
12 N, O, P, and S through X of Tech Data's Opposition to Thomson Consumer's and Thomson SA's
13 Motions to Strike, exhibits that were previously filed under seal because they refer to, contain,
14 and/or reflect excerpts of documents and testimony that have been designated as "Confidential"
15 or "Highly Confidential" by other parties in this action under the terms of the Stipulated
16 Protective Order entered in this case. Accordingly, the undersigned believes good cause exists to
17 seal the portions of Thomson SA's Reply that discuss and/or reference these exhibits.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct.

20 DATED: March 13, 2014 at Denver, Colorado.

21
22 /s/ Jeffrey S. Roberts

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